

FILED

AUSA Eric S. Pruitt (312) 353-5496

JAN 23 2019 *fm*THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

NEAL PATEL,
also known as "@INTERNETLORD,"
"@DEFEAT"

Case No.

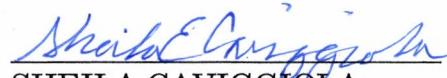
19CR 064

Magistrate Judge Maria Valdez

AFFIDAVIT IN REMOVAL PROCEEDING

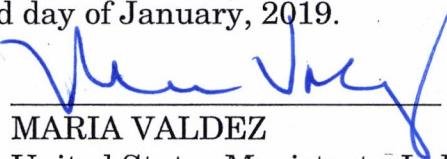
I, BEVERLY MAYO, personally appearing before United States Magistrate Judge Maria Valdez and being duly sworn on oath, state that as a federal law enforcement officer I have been informed that NEAL PATEL, also known as "@INTERNETLORD," and "@DEFEAT," has been charged by Indictment in the Central District of California with the following criminal offenses: conspiracy, in violation of Title 18, United States Code, Section 371; conveying false information concerning the sue of an explosive device, in violation of Title 18, United States Code, Section 844(e); bank fraud, in violation of Title 18, United States Code, Section 1344; and conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349.

A copy of the Indictment is attached. A copy of the arrest warrant also is attached.



SHEILA CAVIGGIOLA
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me this 23rd day of January, 2019.



MARIA VALDEZ
United States Magistrate Judge

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

United States of America v.	Plaintiff(s)	CASE NUMBER: CR 19 CR 00017
NEAL PATEL akas @INTERNETLORD, @DEFEAT	Defendant(s)	WARRANT FOR ARREST UNDER SEAL

TO: UNITED STATES MARSHAL AND ANY AUTHORIZED UNITED STATES OFFICER

YOU ARE HEREBY COMMANDED to arrest NEAL PATEL,
akas @INTERNETLORD, @DEFEAT

and bring him/her forthwith to the nearest Magistrate Judge to answer a(n): Complaint Indictment
 Information Order of Court Probation Violation Petition Violation Notice

Charging him/her with: (ENTER DESCRIPTION OF OFFENSE BELOW)

**18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 844(e): Conveying False Information Concerning the Use of An Explosive Device;
18 U.S.C. § 1344: Bank Fraud;
18 U.S.C. § 1349: Conspiracy to Commit Bank Fraud;
18 U.S.C. § 2(a): Aiding and Abetting**

in violation of the following Title, United States Code, Section(s)
SEE ABOVE

<u>Kiry K. Gray</u> NAME OF ISSUING OFFICER	
<u>Clerk of Court</u> TITLE OF ISSUING OFFICER	
<u>CINDY L. ORELLANA</u>	

<u>January 10, 2019</u>	<u>LOS ANGELES, CALIFORNIA</u>
DATE AND LOCATION OF ISSUANCE	
<u>BY: EDWARD INFANTE</u> NAME OF JUDICIAL OFFICER	

RETURN

THIS WARRANT WAS RECEIVED AND EXECUTED WITH THE ARREST OF THE ABOVE-NAMED DEFENDANT AT (LOCATION):

<p>DATE RECEIVED</p> <hr/> <p>DATE OF ARREST</p> <p>DESCRIPTIVE INFORMATION FOR DEFENDANT CONTAINED ON PAGE TWO</p>	<p>NAME OF ARRESTING OFFICER</p> <hr/> <p>TITLE</p> <hr/> <p>SIGNATURE OF ARRESTING OFFICER</p>
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WARRANT FOR ARREST

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

United States of America

Plaintiff(s)

v.

CASE NUMBER:

CR 9 CR 00017 -**1**NEAL PATEL
akas @INTERNETLORD, @DEFEAT

Defendant(s)

**WARRANT FOR ARREST
UNDER SEAL**

ADDITIONAL DEFENDANT INFORMATION

RACE:	SEX:	HEIGHT:	WEIGHT:	HAIR:	EYES:	OTHER:
DATE OF BIRTH: 1995						
		SCARS, TATTOOS OR OTHER DISTINGUISHING MARKS:				
AUTO YEAR:	AUTO MAKE:	AUTO MODLE:	AUTO COLOR:	AUTO LICENSE NO.	ISSUING STATE	
LAST KNOWN RESIDENCE:			LAST KNOWN EMPLOYMENT			
FBI NUMBER:						
ADDITIONAL INFORMATION:						
INVESTIGATIVE AGENCY NAME: FBI			INVESTIGATIVE AGENCY ADDRESS:			

NOTES:

WARRANT FOR ARREST

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2018 Grand Jury

19 CR 00017-CJC
CR No. 19-

UNITED STATES OF AMERICA,

Plaintiff,

v.

NEAL PATEL,
aka "@INTERNETLORD,"
aka "@DEFEAT,"

Defendant.

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 844(e): Conveying
False Information Concerning the
Use of An Explosive Device;
18 U.S.C. § 1344: Bank Fraud;
18 U.S.C. § 1349: Conspiracy to
Commit Bank Fraud; 18 U.S.C.
§ 2(a): Aiding and Abetting]

The Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. Twitter was an online social networking service on which users posted and interacted with messages known as tweets. Twitter users could also send Direct Messages to one another.

2. A Twitter "handle" was the name a user selected to use on Twitter.

1 3. Defendant NEAL PATEL resided in, and was located in, Des
2 Plaines, Illinois. Defendant PATEL used the Twitter handles
3 @INTERNETLORD and @DEFEAT.

4 4. Unindicted Co-Conspirator No. 1, Tyler Rai Barriss
5 ("Barriss"), also known as ("aka") "@SWAUTISTIC," aka
6 "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex
7 Mendez," aka "Alex," aka "Matthew," aka "Aaron," resided in, and was,
8 at all times relevant to this Indictment, located in, Los Angeles
9 County within the Central District of California. Barriss used the
10 Twitter handles @SWAUTISTIC and @GOREDTUDOR36.

11 5. Waukesha State Bank was a financial institution insured by
12 the Federal Deposit Insurance Corporation.

13 6. "Swatting" was the action or practice of harassing a victim
14 by deceiving an emergency service into sending police and emergency
15 service response teams, including special weapons and tactics
16 ("SWAT") teams, to the victim's address often by making a false
17 report of a serious law enforcement emergency - such as a murder or
18 hostage situation - at the victim's address to trigger the deployment
19 of the response team.

20 7. The above allegations are incorporated by reference into
21 all counts of this Indictment as if fully set forth therein.

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COUNT ONE

[18 U.S.C. § 371]

A. THE OBJECT OF THE CONSPIRACY

4 1. Beginning on a date unknown to the Grand Jury, but no later
5 than December 7, 2017, and continuing through on or about
6 December 10, 2017, in Los Angeles, within the Central District of
7 California, and elsewhere, defendant NEAL PATEL ("PATEL"), also known
8 as ("aka") "@INTERNETLORD," aka "@DEFEAT," together and with others
9 known and unknown to the Grand Jury, knowingly conspired and agreed
10 to, by a telephone and instrument of interstate and foreign commerce,
11 willfully make a threat, and maliciously convey false information
12 knowing the information to be false, concerning an alleged attempt
13 being made, or to be made, to kill, injure, and intimidate an
14 individual and to damage and destroy property by means of fire and an
15 explosive, in violation of Title 18, United States Code, Section
16 844(e).

B. THE MANNER AND MEANS OF THE CONSPIRACY

18 2. The object of the conspiracy was to be carried out, and was
19 carried out, in substance as follows:

20 a. Defendant PATEL and Unindicted Co-Conspirator No. 1,
21 Tyler Rai Barriss ("Barriss"), aka "@SWAUTISTIC," aka
22 "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex
23 Mendez," aka "Alex," aka "Matthew," aka "Aaron," would identify a
24 person or persons that they wanted to harass, intimidate, disrupt,
25 and annoy either by swatting them or by causing them to be evacuated
26 from their locations.

27 b. Defendant PATEL and Barriss would investigate their
28 intended victims, to include identifying their victims' addresses and

1 telephone numbers and the addresses and telephone numbers of law
2 enforcement local to those victims.

3 c. Barriss, posing as someone else, would call law
4 enforcement and maliciously convey false information, knowing that
5 information to be false, and willfully make a threat, about
6 explosives being present at a victim's address to cause a law
7 enforcement response.

8 d. Barriss, posing as someone else, would call the
9 location where he believed a victim was then located and maliciously
10 convey false information, knowing that information to be false, and
11 willfully make a threat, about explosives being present at that
12 location to cause its evacuation.

13 C. OVERT ACTS

14 3. On or about the following dates, in furtherance of the
15 conspiracy and to accomplish its object, defendant PATEL, and other
16 co-conspirators known and unknown to the Grand Jury, committed and
17 caused others to commit various overt acts within the Central
18 District of California, and elsewhere, including, but not limited to,
19 the following:

20 Overt Act No. 1: On or about December 7, 2017, in Twitter
21 direct messages, defendant PATEL asked Barriss to swat Victim R.S.,
22 and Barriss agreed.

23 Overt Act No. 2: On or about December 7, 2017, in Twitter
24 direct messages, defendant PATEL provided Barriss with what he
25 believed to be personal identification information for Victim R.S.,
26 including Victim R.S.'s home address in Milford, Connecticut.

27 Overt Act No. 3: On or about December 7, 2017, Barriss called
28 the Milford Police Department in Milford, Connecticut, identified

1 himself as Victim R.S., and provided what he believed to be the home
2 address of Victim R.S. Barriss, posing as Victim R.S., also falsely
3 reported that he had shot his parents, that he had tied up his
4 siblings and intended to kill them, and that he planned to burn down
5 his house.

6 Overt Act No. 4: On or about December 8, 2017, in Twitter
7 direct messages, Barriss told defendant PATEL that he had swatted
8 Victim R.S.

9 Overt Act No. 5: On or about December 8, 2017, in Twitter
10 direct messages, defendant PATEL provided Barriss with what he
11 believed to be the address for a convention center in Dallas, Texas
12 (the "Convention Center"), where a video game tournament was then
13 occurring.

14 Overt Act No. 6: On or about December 8, 2017, in Twitter
15 Direct Messages, defendant PATEL agreed to create, and did in fact
16 create, an account with a voice-over-internet services provider for
17 Barriss to use in making hoax phone calls to and concerning the
18 Convention Center.

19 Overt Act No. 7: On or about December 8, 2017, Barriss,
20 posing as someone else, called the Convention Center's administrative
21 line and falsely reported that he left backpacks containing
22 explosives in the Convention Center and that they were set to
23 explode.

24 Overt Act No. 8: On or about December 8, 2017, Barriss,
25 posing as someone else, called the Crime Stoppers tip line and
26 maliciously and falsely reported that he left backpacks containing
27 explosives in the Convention Center and that they were set to
28 explode.

1 Overt Act No. 9: On or about December 8, 2017, in Twitter
2 direct messages, defendant PATEL provided Barriss with information
3 about the evacuation of the Convention Center in response to
4 Barriss's knowingly false reports that he planted bombs there.

5 Overt Act No. 10: On or about December 10, 2017, Barriss,
6 posing as someone else, called the Dallas Police Department and
7 maliciously and falsely reported that he and a friend had left
8 backpacks containing explosives inside the Convention Center and that
9 they were set to explode.

10 Overt Act No. 11: On or about December 10, 2017, Barriss,
11 posing as someone else, called the Convention Center's administrative
12 line and maliciously and falsely reported that he had planted a bomb
13 there. That day, the Convention Center was again evacuated.

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1 COUNT TWO

2 [18 U.S.C. §§ 844(e), 2(a)]

3 On or about December 7, 2017, in Los Angeles County, within the
4 Central District of California, defendant NEAL PATEL ("PATEL"), also
5 known as ("aka") "@INTERNETLORD," aka "@DEFEAT," and Unindicted Co-
6 Conspirator No. 1, Tyler Rai Barriss, aka "@SWAUTISTIC," aka
7 "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex
8 Mendez," aka "Alex," aka "Matthew," aka "Aaron," each aiding and
9 abetting the other, by a telephone and other instrument of commerce,
10 willfully made a threat, and maliciously conveyed false information
11 knowing the information to be false, to a police department in
12 Milford, Connecticut, concerning an alleged attempt being made, or to
13 be made, to kill, injure, and intimidate an individual and to damage
14 and destroy property by means of fire and an explosive, namely, and
15 in substance and effect, that a person had shot his parents, that he
16 had tied up his siblings and intended to kill them, and that he
17 planned to burn down his house.

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COUNT THREE

[18 U.S.C. §§ 844(e), 2(a)]

3 On or about December 8, 2017, in Los Angeles County, within the
4 Central District of California, defendant NEAL PATEL, also known as
5 ("aka") "@INTERNET LORD," aka "@DEFEAT," and Unindicted Co-
6 Conspirator No. 1, Tyler Rai Barriss, aka "@SWAUTISTIC," aka
7 "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex
8 Mendez," aka "Alex," aka "Matthew," aka "Aaron," each aiding and
9 abetting the other, by a telephone and other instrument of commerce,
10 willfully made a threat, and maliciously conveyed false information
11 knowing the information to be false, to a convention center in
12 Dallas, Texas (the "Convention Center"), concerning an alleged
13 attempt being made, or to be made, to kill, injure, and intimidate an
14 individual and to damage and destroy property by means of fire and an
15 explosive, namely, and in substance and effect, that a person left
16 backpacks containing explosives in the Convention Center and that
17 they were set to explode.

COUNT FOUR

[18 U.S.C. § 1349]

A. THE OBJECT OF THE CONSPIRACY

4 1. Beginning on a date unknown to the Grand Jury, but no later
5 than November 27, 2017, and continuing through on or about
6 December 5, 2017, in Los Angeles County, within the Central District
7 of California, and elsewhere, defendant NEAL PATEL ("PATEL"), also
8 known as ("aka") "@INTERNETLORD," aka "@DEFEAT," together with others
9 known and unknown to the Grand Jury, knowingly conspired and agreed
10 to commit bank fraud, in violation of Title 18, United States Code,
11 Section 1344(2).

B THE MANNER AND MEANS OF THE CONSPIRACY

13 2. The object of the conspiracy was to be carried out, and was
14 carried out, in substance as follows:

15 a. Defendant PATEL would obtain credit and debit card
16 account numbers that he knew belonged to real persons;

17 b. Defendant PATEL would use those unauthorized debit and
18 credit card account numbers to purchase clothing and other items
19 online for, and at the request of, Unindicted Co-Conspirator No. 1,
20 Tyler Rai Barriss ("Barriss"), aka "@SWAUTISTIC," aka

21 " @GOREDTUTOR36 , " aka " Robert Hayward , " aka " Robert , " aka " Alex
22 Mendez , " aka " Alex , " aka " Matthew , " aka " Aaron ; "

23 c. In purchasing those items, defendant PATEL would
24 falsely represent to online retailers that he was authorized to use
25 those credit and debit card account numbers to make purchases, when,
26 in fact, he was not authorized to do so;

27 d. In making those false representations to purchase
28 those items, defendant PATEL would induce the online retailers to

1 sell him merchandise and to cause the financial institutions that
2 issued the credit and debit accounts to remit funds to the retailers
3 as payments for the sales.

4 C. OVERT ACTS

5 3. On or about the following dates, in furtherance of the
6 conspiracy and to accomplish its object, defendant PATEL, together
7 with other co-conspirators known and unknown to the Grand Jury,
8 committed and caused others to commit various overt acts within the
9 Central District of California and elsewhere, including the
10 following:

11 Overt Act No. 1: On or before November 27, 2017, defendant
12 PATEL opened an account with a virtual private network service
13 provider (the "VPN Service").

14 Overt Act No. 2: On December 1, 2017, defendant PATEL
15 attempted to purchase a 1-month subscription to the VPN Service with
16 a credit card number that he knew belonged to a real person and that
17 he was not authorized to use.

18 Overt Act No. 3: On or about December 2, 2017, in Twitter
19 Direct Messages, Barriss asked defendant PATEL to purchase a cap
20 bearing a NASA logo (the "NASA cap") for Barriss.

21 Overt Act No. 4: On or about December 3, 2017, in Twitter
22 Direct Messages, Barriss again asked defendant PATEL to purchase the
23 NASA cap for him. Defendant PATEL agreed to make the purchase after
24 obtaining credit and debit card account numbers belonging to others
25 that he knew he was not authorized to use.

26 Overt Act No. 5: On December 3, 2017, and again on
27 December 4, 2017, in Twitter Direct Messages, Barriss repeatedly
28 insisted that defendant PATEL purchase the NASA cap for him and

1 provided defendant PATEL with Barriss's mailing address in Los
2 Angeles.

3 Overt Act No. 6: On or before December 4, 2017, defendant
4 PATEL obtained a debit card account number (the "Account Number"),
5 which he knew belonged to Victim J.B., which was linked to her
6 checking account at Waukesha State Bank.

7 Overt Act No. 7: On or about December 4, 2017, defendant
8 PATEL purchased the NASA cap from an online retailer, using the
9 unauthorized Account Number. Defendant PATEL represented to the
10 online retailer that he was authorized to use the Account Number to
11 make the purchase when, in fact, he was not. Defendant PATEL
12 provided the online retailer with Barriss's name and address in Los
13 Angeles for shipping purposes.

14 Overt Act No. 8: On or about December 4, 2017, Barriss told
15 defendant PATEL that he wanted him to purchase shoes for him.

16 Overt Act No. 9: On or about December 4, 2017, defendant
17 PATEL purchased a 1-month subscription to the VPN Service, using the
18 Account Number, knowing that he was not authorized to use that
19 Account Number.

20 Overt Act No. 10: On or about December 5, 2017, in Twitter
21 Direct Messages, Barriss told defendant PATEL that he had received
22 the NASA cap and was thankful for it.

23 Overt Act No. 11: On or about December 6, 2017, in Twitter
24 Direct Messages, Barriss told defendant PATEL that he wanted him to
25 purchase shoes and a belt for him. He then directed defendant PATEL
26 to a website and asked him, "Can you card it[?]," which was coded
27 language indicating his intent that defendant PATEL use an
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1 unauthorized credit or debit card account number to make the
2 purchase. Defendant PATEL responded, "yessir."
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1 COUNT FIVE

2 [18 U.S.C. §§ 1344, 2(a)]

3 A. THE SCHEME TO DEFRAUD

4 1. Beginning on a date unknown to the Grand Jury, but no later
5 than November 27, 2017, and continuing through on or about
6 December 5, 2017, in Los Angeles County, within the Central District
7 of California, and elsewhere, defendant NEAL PATEL ("PATEL"), also
8 known as ("aka") "@INTERNETLORD," aka "@DEFEAT," together with others
9 known and unknown to the Grand Jury, knowingly and with intent to
10 defraud, executed a scheme to obtain moneys, funds, assets, and other
11 property owned by and in the custody and control of Waukesha State
12 Bank, a federal insured bank, by means of material false and
13 fraudulent pretenses, representations, and promises, and the
14 concealment of material facts.

15 B. THE MANNER AND MEANS OF THE FRAUDULENT SCHEME

16 2. The fraudulent scheme operated, in substance, in the
17 following manner:

18 a. Defendant PATEL would obtain credit and debit card
19 account numbers that he knew belonged to real persons;

20 b. Defendant PATEL would use those unauthorized debit and
21 credit card account numbers to purchase clothing and other items
22 online for, and at the request of, Unindicted Co-Conspirator No. 1,
23 Tyler Rai Barriss ("Barriss"), aka "@SWAUTISTIC," aka
24 "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex
25 Mendez," aka "Alex," aka "Matthew," aka "Aaron;"

26 c. In purchasing those items, defendant PATEL would
27 falsely represent to online retailers that he was authorized to use
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1 those credit and debit card account numbers to make purchases, when,
2 in fact, he was not authorized to do so;

3 d. In making those false representations to purchase
4 those items, defendant PATEL would induce the online retailers to
5 sell him merchandise and to cause the financial institutions that
6 issued the credit and debit accounts to remit funds to the retailers
7 as payments for the sales.

8 C. EXECUTION OF THE FRAUDULENT SCHEME

9 3. On or about the following date, in Los Angeles County,
10 within the Central District of California, and elsewhere, defendant
11 PATEL committed the following acts which constituted an execution of
12 the fraudulent scheme:

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COUNT	DATE	ACT
FIVE	December 4, 2017	Defendant PATEL purchased a NASA cap from an online retailer, using an unauthorized Account Number, which he knew belonged to Victim J.B., which was linked to her checking account at Waukesha State Bank. Defendant PATEL represented to the online retailer that he was authorized to use the Account Number to make the purchase when, in fact, he was not. Defendant PATEL provided the online retailer with Barriss's name and address in Los Angeles for shipping purposes. The online retailer shipped the item to Barriss in Los Angeles, for which Barriss thanked defendant PATEL.

A TRUE BILL

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Foreperson

NICOLA T. HANNA
United States Attorney

Pat R. Fitzgerald

PATRICK R. FITZGERALD
Assistant United States Attorney
Chief, National Security Division

CHRITOPHER D. GRIGG
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GEORGE E. PENCE
Assistant United States Attorney
Terrorism and Export Crimes
Section